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Attorneys for Defendants
County of Mendocino and Mendocino County Sheriff's Office, Eloise Kelsey; Stephen Bohner;
Eldon Johnston

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
EUREKA-McKINLEYVILLE DIVISION**

DANIEL JACKSON KISLIUK,)	24-cv-03440-RMI
)	
Plaintiff,)	MENDOCINO COUNTY DEFENDANTS'
)	ANSWER TO SECOND AMENDED
v.)	COMPLAINT
)	
CITY OF FORT BRAGG et al.,)	Magistrate Judge Robert M. Illman
)	
Defendants.)	

The County of Mendocino, Mendocino County Sheriff's Office, Eloise Kelsey, Stephen Bohner, and Eldon Johnston (hereinafter "County Defendants") answer Plaintiff's Second Amended Complaint ("SAC") as follows:

PARTIES

1. Answering Paragraph 1 of the SAC, Answering County Defendants are without sufficient knowledge, information or belief as to the truthfulness of the allegations in this paragraph and therefore deny all such allegations therein.

2. Answering Paragraph 2 of the SAC, County Defendants admit that the addresses associated with the County Defendants are correctly associated with those defendants. County

1 Defendants are without sufficient knowledge, information or belief as to the truthfulness of the
2 remaining allegations in this paragraph and therefore deny all remaining allegations.

3 **JURISDICTION**

4 3. Answering Paragraph 3 of the SAC, this paragraph contains only legal argument
5 and has no factual allegations requiring an answer. County Defendants deny each and every
6 allegation implicitly or otherwise asserted therein.

7 **VENUE**

8 4. Answering Paragraph 4 of the SAC, Answering County Defendants admit that
9 the allegations in the SAC relate to events occurring within the venue of this court and that at
10 least one defendant is located in this District.

11 **INTRADISTRICT ASSIGNMENT**

12 5. Answering Paragraph 5 of the SAC, Answering Defendants admit that this
13 lawsuit arose in Mendocino County.

14 **STATEMENT OF FACTS**

15 6. Answering Paragraph 6 of the SAC, Answering County Defendants are without
16 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
17 paragraph and therefore deny all such allegations therein.

18 7. Answering Paragraph 7 of the SAC, Answering County Defendants are without
19 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
20 paragraph and therefore deny all such allegations therein.

21 8. Answering Paragraph 8 of the SAC, Answering County Defendants are without
22 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
23 paragraph and therefore deny all such allegations therein.

24 9. Answering Paragraph 9 of the SAC, Answering County Defendants are without
25 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
26 paragraph and therefore deny all such allegations therein.

1 10. Answering Paragraph 10 of the SAC, Answering County Defendants are without
2 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
3 paragraph and therefore deny all such allegations therein.

4 11. Answering Paragraph 11 of the SAC, Answering County Defendants are without
5 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
6 paragraph and therefore deny all such allegations therein.

7 12. Answering Paragraph 12 of the SAC, Answering County Defendants are without
8 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
9 paragraph and therefore deny all such allegations therein.

10 13. Answering Paragraph 13 of the SAC, Answering County Defendants are without
11 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
12 paragraph and therefore deny all such allegations therein.

13 14. Answering Paragraph 14 of the SAC, Answering County Defendants are without
14 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
15 paragraph and therefore deny all such allegations therein.

16 15. Answering Paragraph 15 of the SAC, Answering County Defendants are without
17 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
18 paragraph and therefore deny all such allegations therein.

19 16. Answering Paragraph 16 of the SAC, Answering County Defendants are without
20 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
21 paragraph and therefore deny all such allegations therein.

22 17. Answering Paragraph 17 of the SAC, Answering County Defendants are without
23 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
24 paragraph and therefore deny all such allegations therein.

25 18. Answering Paragraph 18 of the SAC, Answering County Defendants are without
26 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
27 paragraph and therefore deny all such allegations therein.
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1 19. Answering Paragraph 19 of the SAC, Answering County Defendants are without
2 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
3 paragraph and therefore deny all such allegations therein.

4 20. Answering Paragraph 20 of the SAC, Answering County Defendants are without
5 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
6 paragraph and therefore deny all such allegations therein.

7 21. Answering Paragraph 21 of the SAC, the allegations in this paragraph against
8 County Defendants relate to claims that have been dismissed by this court, and accordingly, no
9 response is required; County Defendants neither admit nor deny such allegations. Answering
10 County Defendants are without sufficient knowledge, information or belief as to the truthfulness
11 of the allegations remaining in this paragraph and therefore deny all such remaining allegations.

12 22. Answering Paragraph 22 of the SAC, the allegations in this paragraph relate to
13 claims that have been dismissed by this court, and accordingly, no response is required; County
14 Defendants neither admit nor deny such allegations.

15 23. Answering Paragraph 23 of the SAC, the allegations in this paragraph against
16 County Defendants relate to claims that have been dismissed by this court, and accordingly, no
17 response is required; County Defendants neither admit nor deny such allegations. Answering
18 County Defendants are without sufficient knowledge, information or belief as to the truthfulness
19 of the allegations remaining in this paragraph and therefore deny all such remaining allegations.

20 24. Answering Paragraph 24 of the SAC, Answering County Defendants are without
21 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
22 paragraph and therefore deny all such allegations therein.

23 25. Answering Paragraph 25 of the SAC, Answering County Defendants are without
24 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
25 paragraph and therefore deny all such allegations therein.

26 26. Answering Paragraph 26 of the SAC, Answering County Defendants are without
27 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
28 paragraph and therefore deny all such allegations therein.

1 27. Answering Paragraph 27 of the SAC, Answering County Defendants are without
2 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
3 paragraph and therefore deny all such allegations therein.

4 28. Answering Paragraph 28 of the SAC, the allegations in this paragraph related to
5 allegations that Plaintiff was denied a religious diet and allegations against Defendant Johnston
6 pertain to claims that have been dismissed by this court, and accordingly, no response is
7 required; County Defendants neither admit nor deny such allegations. Answering County
8 Defendants are without sufficient knowledge, information or belief as to the truthfulness of the
9 remaining allegations in this paragraph and therefore deny all such remaining allegations.

10 29. Answering Paragraph 29 of the SAC, the allegations in this paragraph against
11 Defendant Kelsey pertain to claims that have been dismissed by this court, and accordingly, no
12 response is required; County Defendants neither admit nor deny such allegations. Answering
13 County Defendants are without sufficient knowledge, information or belief as to the truthfulness
14 of the remaining allegations in this paragraph and therefore deny all such remaining allegations.

15 30. Answering Paragraph 30 of the SAC, County Defendants admit that Plaintiff was
16 booked into the Mendocino County jail on November 7, 2023. County admits that during
17 Plaintiff's November 9, 2023 court appearance, the court expressed what appears to be
18 confusion regarding Plaintiff's custody status. County defendants deny that court records and
19 transcripts show that Plaintiff's bail had not been revoked for the events of November 7, 2023,
20 and deny that Plaintiff was illegally held in custody at the Mendocino County Jail at any time.
21 The allegations in this paragraph relate to allegations that Plaintiff was denied a religious diet,
22 and allegations against Defendant Kelsey pertain to claims that have been dismissed by this
23 court, and accordingly, no response is required; County Defendants neither admit nor deny such
24 allegations. Answering County Defendants are without sufficient knowledge, information or
25 belief as to the truthfulness of the remaining allegations in this paragraph and therefore deny all
26 such remaining allegations.

27 31. Answering Paragraph 31 of the SAC, Answering County Defendants admit that
28 Plaintiff was released from the Mendocino County Jail on November 9, 2023. Answering County

1 Defendants deny that Plaintiff was unlawfully held in custody in the Mendocino County Jail.
2 Answering County Defendants are without sufficient knowledge, information or belief as to the
3 truthfulness of the remaining allegations in this paragraph and therefore deny all such remaining
4 allegations.

5 32. Answering Paragraph 32 of the SAC, the allegations in this paragraph against
6 Defendant Kelsey pertain to claims that have been dismissed by this court, and accordingly, no
7 response is required; County Defendants neither admit nor deny such allegations. Answering
8 County Defendants are without sufficient knowledge, information or belief as to the truthfulness
9 of the remaining allegations in this paragraph and therefore deny all such remaining allegations.

10 33. Answering Paragraph 33 of the SAC, the allegations in this paragraph against
11 Defendant Kelsey pertain to claims that have been dismissed by this court, and accordingly, no
12 response is required; County Defendants neither admit nor deny such allegations. Answering
13 County Defendants are without sufficient knowledge, information or belief as to the truthfulness
14 of the remaining allegations in this paragraph and therefore deny all such remaining allegations.

15 34. Answering Paragraph 34 of the SAC, Answering County Defendants are without
16 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
17 paragraph and therefore deny all such allegations therein.

18 35. Answering Paragraph 35 of the SAC, the allegations in this paragraph against
19 Defendant Kelsey pertain to claims that have been dismissed by this court, and accordingly, no
20 response is required; County Defendants neither admit nor deny such allegations. Answering
21 County Defendants are without sufficient knowledge, information or belief as to the truthfulness
22 of the remaining allegations in this paragraph and therefore deny all such remaining allegations.

23 36. Answering Paragraph 36 of the SAC, Answering County Defendants are without
24 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
25 paragraph and therefore deny all such allegations therein.

26 37. Answering Paragraph 37 of the SAC, Answering County Defendants are without
27 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
28 paragraph and therefore deny all such allegations therein.

1 45. Answering Paragraph 45 of the SAC, the allegations in this paragraph relating to
2 Plaintiff's religious diet pertain to claims that have been dismissed by this court, and
3 accordingly, no response is required; County Defendants neither admit nor deny such
4 allegations. Answering County Defendants are without sufficient knowledge, information or
5 belief as to the truthfulness of the remaining allegations in this paragraph and therefore deny all
6 such remaining allegations.

7 46. Answering Paragraph 46 of the SAC, Answering County Defendants are without
8 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
9 paragraph and therefore deny all such allegations therein.

10 47. Answering Paragraph 47 of the SAC, Answering County Defendants are without
11 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
12 paragraph and therefore deny all such allegations therein.

13 48. Answering Paragraph 48 of the SAC, Answering County Defendants are without
14 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
15 paragraph and therefore deny all such allegations therein.

16 49. Answering Paragraph 49 of the SAC, Answering County Defendants are without
17 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
18 paragraph and therefore deny all such allegations therein.

19 50. Answering Paragraph 50 of the SAC, the allegations in this paragraph relating to
20 Plaintiff's religious diet pertain to claims that have been dismissed by this court, and
21 accordingly, no response is required; County Defendants neither admit nor deny such
22 allegations. Answering County Defendants are without sufficient knowledge, information or
23 belief as to the truthfulness of the remaining allegations in this paragraph and therefore deny all
24 such remaining allegations.

25 51. Answering Paragraph 51 of the SAC, Answering County Defendants are without
26 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
27 paragraph and therefore deny all such allegations therein.

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1 52. Answering Paragraph 52 of the SAC, the allegations in this paragraph relating to
2 Plaintiff's religious diet pertain to claims that have been dismissed by this court, and
3 accordingly, no response is required; County Defendants neither admit nor deny such
4 allegations. Answering County Defendants are without sufficient knowledge, information or
5 belief as to the truthfulness of the remaining allegations in this paragraph and therefore deny all
6 such remaining allegations.

7 53. Answering Paragraph 53 of the SAC, Answering County Defendants are without
8 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
9 paragraph and therefore deny all such allegations therein.

10 54. Answering Paragraph 54 of the SAC, Answering County Defendants are without
11 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
12 paragraph and therefore deny all such allegations therein.

13 55. Answering Paragraph 55 of the SAC, Answering County Defendants are without
14 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
15 paragraph and therefore deny all such allegations therein.

16 56. Answering Paragraph 56 of the SAC, Answering County Defendants are without
17 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
18 paragraph and therefore deny all such allegations therein.

19 57. Answering Paragraph 57 of the SAC, Answering County Defendants are without
20 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
21 paragraph and therefore deny all such allegations therein.

22 58. Answering Paragraph 58 of the SAC, Answering County Defendants are without
23 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
24 paragraph and therefore deny all such allegations therein.

25 59. Answering Paragraph 59 of the SAC, the allegations in this paragraph against
26 Defendant Kelsey pertain to claims that have been dismissed by this court, and accordingly, no
27 response is required; County Defendants neither admit nor deny such allegations. Answering
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1 County Defendants are without sufficient knowledge, information or belief as to the truthfulness
2 of the remaining allegations in this paragraph and therefore deny all such remaining allegations.

3 60. Answering Paragraph 60 of the SAC, the allegations in this paragraph relating to
4 Plaintiff's religious diet and against Defendant Johnston pertain to claims that have been
5 dismissed by this court, and accordingly, no response is required; County Defendants neither
6 admit nor deny such allegations. Answering County Defendants are without sufficient
7 knowledge, information or belief as to the truthfulness of the remaining allegations in this
8 paragraph and therefore deny all such remaining allegations.

9 61. Answering Paragraph 61 of the SAC, the allegations in this paragraph relating to
10 Plaintiff's religious diet and against Defendant Johnston pertain to claims that have been
11 dismissed by this court, and accordingly, no response is required; County Defendants neither
12 admit nor deny such allegations. Answering County Defendants are without sufficient
13 knowledge, information or belief as to the truthfulness of the remaining allegations in this
14 paragraph and therefore deny all such remaining allegations.

15 62. Answering Paragraph 62 of the SAC, the allegations in this paragraph relating to
16 Plaintiff's religious diet, allegations against related to the District Attorney's Office and
17 Defendants Johnston and Kelsey pertain to claims that have been dismissed by this court, and
18 accordingly, no response is required; County Defendants neither admit nor deny such
19 allegations. Answering County Defendants are without sufficient knowledge, information or
20 belief as to the truthfulness of the remaining allegations in this paragraph and therefore deny all
21 such remaining allegations.

22 63. Answering Paragraph 63 of the SAC, Answering County Defendants are without
23 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
24 paragraph and therefore deny all such allegations therein.

25 64. Answering Paragraph 64 of the SAC, Answering County Defendants are without
26 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
27 paragraph and therefore deny all such allegations therein.

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1 65. Answering Paragraph 65 of the SAC, Answering County Defendants are without
2 sufficient knowledge, information or belief as to the truthfulness of the allegations in this
3 paragraph and therefore deny all such allegations therein.

4 66. Answering Paragraph 66 of the SAC, the allegations against Answering County
5 Defendants in the paragraph contain only legal argument and no factual allegations requiring an
6 answer. Answering County Defendants are without sufficient knowledge, information or belief
7 as to the truthfulness of the allegations remaining in this paragraph and therefore deny all such
8 remaining allegations.

9 67. Answering Paragraph 67 of the SAC, the allegations against Answering County
10 Defendants in the paragraph contain only legal argument and no factual allegations requiring an
11 answer. Answering County Defendants are without sufficient knowledge, information or belief
12 as to the truthfulness of the allegations remaining in this paragraph and therefore deny all such
13 remaining allegations.

14 68. Answering Paragraph 68 of the SAC, the allegations against Answering County
15 Defendants in the paragraph contain only legal argument and no factual allegations requiring an
16 answer. Answering County Defendants are without sufficient knowledge, information or belief
17 as to the truthfulness of the allegations remaining in this paragraph and therefore deny all such
18 remaining allegations.

19 69. Answering Paragraph 69 of the SAC, the allegations in this paragraph relating to
20 Plaintiff's religious diet and allegations against Defendant Johnston pertain to claims that have
21 been dismissed by this court, and accordingly, no response is required; County Defendants
22 neither admit nor deny such allegations. County defendants deny that Plaintiff was not released
23 after posting bail. Answering County Defendants are without sufficient knowledge, information
24 or belief as to the truthfulness of the remaining allegations in this paragraph and therefore deny
25 all such remaining allegations.

26 70. Answering Paragraph 70 of the SAC, the allegations against in the first sentence
27 of this paragraph contain only legal argument and no factual allegations requiring an answer.
28 Answering County Defendants are without sufficient knowledge, information or belief as to the

1 truthfulness of the allegations remaining in this paragraph and therefore deny all such remaining
2 allegations.

3 71. Answering Paragraph 71 of the SAC, the allegations in this paragraph relating to
4 Plaintiff's religious diet and allegations against Defendant Johnston pertain to claims that have
5 been dismissed by this court, and accordingly, no response is required; County Defendants
6 neither admit nor deny such allegations. Answering Defendant deny that the County failed to
7 adequately train County staff. Answering County Defendants are without sufficient knowledge,
8 information or belief as to the truthfulness of the remaining allegations in this paragraph and
9 therefore deny all such remaining allegations.

10 **DEMAND FOR RELIEF**

11 County Defendants deny the allegations underlying Plaintiff's request for relief
12 contained in the Complaint and deny that Plaintiff is entitled to any relief requested.

13 **AFFIRMATIVE DEFENSES**

14 As separate and alternative defenses, and without admitting any allegations raised in
15 Plaintiff's Complaint, County Defendants allege each of the following affirmative defenses:

16 AS A FIRST SEPARATE AND AFFIRMATIVE DEFENSE, the Complaint fails to
17 allege facts sufficient to constitute a cause of action.

18 AS A SECOND SEPARATE AND AFFIRMATIVE DEFENSE, to the extent any are
19 named, individual defendants are entitled to qualified immunity under 42 U.S.C. § 1983.
20 Defendants acted at all times herein relevant in good faith, with due care, within the scope of
21 discretion, and pursuant to laws, regulations, rules and practices reasonably believed to be in
22 accordance with the Constitution and laws of the United States.

23 AS A THIRD SEPARATE AND AFFIRMATIVE DEFENSE, the complaint and each
24 cause of action therein are barred and this court is without jurisdiction as there has been a failure
25 to exhaust administrative remedies.

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1 AS A FOURTH SEPARATE AND AFFIRMATIVE DEFENSE, should any plaintiff
2 herein recover damages, the amount thereof should be abated, apportioned and reduced to the
3 extent that the negligence of any other person or entity caused or contributed to damages, if any.

4 AS A FIFTH SEPARATE AND AFFIRMATIVE DEFENSE, all happenings and events,
5 damages and injuries, if any there were, alleged in the Complaint were proximately caused and
6 contributed to by the negligence of plaintiff and/or others, each and all of whom failed to
7 exercise ordinary care in their own behalf at all times and places alleged in the SAC.

8 AS A SIXTH SEPARATE AND AFFIRMATIVE DEFENSE, the claims made in the
9 SAC are barred by the doctrines of estoppel, laches and/or waiver.

10 AS A SEVENTH SEPARATE AND AFFIRMATIVE DEFENSE, County defendants,
11 at all times relevant herein, acted in legislative, judicial, quasi-legislative and quasi-judicial
12 capacity and is entitled to absolute and unqualified official immunity.

13 AS AN EIGHTH SEPARATE AND AFFIRMATIVE DEFENSE, Plaintiff's claims in
14 the SAC are barred by the doctrine of unclean hands and/or Plaintiff's own unlawful conduct.

15 AS A NINTH SEPARATE AND AFFIRMATIVE DEFENSE, the causes of action
16 therein are subject to the statutory limitation of Civil Code section 1431 et seq., relating to joint
17 and several liabilities for economic and noneconomic damages.

18 AS A TENTH SEPARATE AND AFFIRMATIVE DEFENSE, at all times referred to in
19 the SAC, County acted reasonably and in good faith within the meaning of state and federal law.

20 AS AN ELEVENTH SEPARATE AND AFFIRMATIVE DEFENSE, the damages
21 alleged in the SAC were caused solely by the acts and/or omissions of other parties for whom
22 County was not responsible.

23 AS A TWELFTH SEPARATE AND AFFIRMATIVE DEFENSE, Plaintiff's claims for
24 relief are barred, in whole or in part, by Plaintiff's failure to mitigate the alleged damages.

25 AS A THIRTEENTH SEPARATE AND AFFIRMATIVE DEFENSE, answering
26 defendants have not deprived any person of any right, privilege or immunity guaranteed by the
27 Constitution or laws of the United States. There has been no deprivation of any right, privilege
28 or immunity guaranteed by the laws of Constitution of the United States.

1 AS A FOURTEENTH SEPARATE AND AFFIRMATIVE DEFENSE, all acts of
2 defendants, if any there were, occurred in the proper exercise of police powers without malice or
3 intent to deprive any person of any right arising under the Constitution of laws of the United
4 States, or to do any person any other injury.

5 AS A FIFTEENTH SEPARATE AND AFFIRMATIVE DEFENSE, Plaintiff's state law
6 claims are barred by the statutory immunities and limitations of liability provided by state law,
7 including but not limited to those provided by California Government Code §§ 810 through
8 996.6.

9 AS A SIXTEENTH SEPARATE AND AFFIRMATIVE DEFENSE, to the extent that
10 the Answering County Defendants were not policy makers with regard to the issues alleged, they
11 are not liable under 42 U.S.C. § 1983.

12 AS A SEVENTEENTH SEPARATE AND AFFIRMATIVE DEFENSE, Plaintiff's
13 Complaint fails as to defendant Sheriff's Office because it does not state a cause of action under
14 42 U.S.C § 1983 because each and every allegation fails to adequately state a nexus between the
15 plaintiff's alleged injuries and the alleged policy, procedure, or custom.

16 AS AN EIGHTEENTH SEPARATE AND AFFIRMATIVE DEFENSE, because the
17 complaint is couched in conclusory terms, all affirmative defenses that may be applicable to the
18 within action cannot be fully anticipated. Accordingly, the right to assert additional affirmative
19 defenses, if and to the extent that such affirmative defenses are applicable, is reserved.

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1 WHEREFORE, County Defendants pray for judgment as follows:

- 2 1. That judgment be rendered in favor of County Defendants against Plaintiff;
- 3 2. That Plaintiff take nothing by way of his Complaint;
- 4 3. That County Defendants be awarded costs of suit and attorney's fees; and
- 5 4. For such other and further relief as the Court may deem just and proper.

6
7 Dated: April 24, 2025

Respectfully submitted,
CHARLOTTE E. SCOTT,
County Counsel

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10 By:



BRINA A. BLANTON, Assistant County Counsel
Attorneys for Defendant Mendocino County

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PROOF OF SERVICE

I hereby declare:

At the time of service, I was at least eighteen years of age and not a party to this legal action. My business address is Mendocino County Counsel, 501 Low Gap Road, Room 1030, Ukiah, California, 95482. My electronic service address is cocosupport@mendocinocounty.gov.

On April 24, 2025, I caused service of the within by first class mail.

MENDOCINO COUNTY DEFENDANTS' ANSWER TO SECOND AMENDED COMPLAINT

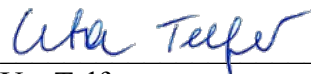
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of April, 2025, at Ukiah, California.



Uta Telfer